

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JIM BISHOP, derivatively on behalf of HF FOODS GROUP INC.,	:	
	:	
	:	
Plaintiff,	:	Case No.:
	:	
ZHOU MIN NI, XIAO MOU	:	
ZHANG, CAIXUAN XU,	:	
JIAN MING NI, ZHEHUI NI,	:	
HONG WANG, CHAN SIN	:	
WONG, and REN HUA ZHENG,	:	
	:	
Defendants,	:	
And	:	
	:	<b><u>JURY TRIAL DEMANDED</u></b>
HF FOODS GROUP INC.,	:	
	:	
Nominal Defendant.	:	

**MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL**

Plaintiff Jim Bishop (“Plaintiff”), by his attorneys, hereby requests leave to file his Verified Stockholder Derivative Complaint in this action under seal. In support of this motion, Plaintiff states as follows:

1. This is a verified stockholder derivative action brought by Plaintiff on behalf of nominal defendant HF Foods Group, Inc. (“HFFG” or the “Company”) against certain officers and directors for breach of fiduciary duty, Violation of Section 14(a) of the Securities Exchange Act of 1934, unjust enrichment and waste of corporate assets.

2. HFFG provided to Plaintiff certain documents which the Company claims contain nonpublic, confidential, proprietary, or commercially sensitive information. Plaintiff used certain information contained within these documents in his Complaint. Pursuant to the Confidentiality and Non-Disclosure Agreement Governing the Inspection of Books and Records dated July 14, 2020, Plaintiff is required to request permission of the Court to file his Complaint under seal.

3. Therefore, Plaintiff requests the Court's permission to file his Complaint under seal. In *Littlejohn v. Bic Corp.*, 851 F.2d 673 (3d Cir. 1988), the Third Circuit held that the right of access to judicial proceedings and records "is not absolute." *Id.* at 678 (citing *Nixon v. Warner Comm., Inc.*, 435 U.S. 589, 598 (1978)). Rather, "[c]ourts may deny access to judicial records, for example, where they are sources of business information that might harm a litigant's competitive standing. *Littlejohn*, 851 F.2d at 678 (quoting *Nixon*, 435 U.S. at 598); see also *Leucadia, Inc. v. Applied Extrusion Tech, Inc.*, 998 F.2d 157, 166 (3d Cir. 1993) ("Documents containing trade secrets or other confidential business information may be protected from disclosure."). Based on HFFG's representations that its production contains confidential information, the Court should allow Plaintiff to file the Complaint under seal.

WHEREFORE, Plaintiff respectfully requests leave to file his Complaint in this action under seal. Plaintiff will then promptly provide HFFG with the Complaint

to enable it to review it for any information that it believes is nonpublic, confidential, proprietary, or commercially sensitive. Plaintiff can then file a redacted, public version of the Complaint.

Respectfully submitted,

Dated: August 21, 2020

**DELEEUW LAW LLC**

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